## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

Kangol LLC,	)
Plaintiff,	}
	) Case No. 24-CV-01636
v.	)
au ce	) Judge Sharon Johnson Coleman
The Partnerships and	
Unincorporated Associations	
Identified on Schedule A,	
Defendants.	

## DECLARATION OF SHENGHONG XU

- I, Shenghong Xu, declare under penalty of perjury under the laws of the United States as follows:
  - 1. My name is Shenghong Xu. I am a resident and citizen of China. I read and write fluently in English and did not require a translator for this declaration.
  - 2. I am the controlling shareholder (owning 66% of the shares), the legal representative, and the manager of Hangzhou Chuanyue Silk Import & Export Co., Ltd. ("Hangzhou Chuanyue"), a Chinese company engaged in foreign trade and the sale of silk products. The company has been in existence since 2009.
  - 3. The company's registered address is: No. 252-256, Hangzhou China Silk City, (near the west side of Xinhua Road and Jiankang Road), Gongshu District, Hangzhou City, China. This is the address listed in Chinese public records.

- 4. The address listed in the Hangzhou Chuanyue's U.S. trademark registration for DANA XU is: No. 252-257, Hangzhou China Silk City, Xiacheng District, Hangzhou, Zhejiang, China 310000.
- 5. The difference between "252-256" and "252-257" is because in 2021 shop number 257 was transferred to another company that I own, which led to an update in the registered address to "252-256."
- 6. As shown in a picture on Hangzhou Chuanyue's website https://www.danasilk.com/, the company has a permanent store front located at 252-257, Hangzhou China Silk City. That picture is attached as **Exhibit** C-1.
- 7. Any difference in the company's address between "Xiacheng District" and "Gongshu District" is because in April 2021, the Chinese government abolished the Xiacheng District and Gongshu District and merged them into a new Gongshu District. Therefore, addresses previously listed under Xiacheng District now fall under Gongshu District.
- 8. Any mail or correspondence sent to either "252-257" or "252-256" would still reach Hangzhou Chuanyue, as they refer to the same physical location within Hangzhou China Silk City.
- 9. The company also uses the street address "No. 217 Xinhua Road" in business communications, including marketing materials. This address corresponds to one of the general addresses of Hangzhou China Silk City.

- The store numbers (such as "252-256") are visibly posted on the shops within Hangzhou China Silk City.
- 11. Hangzhou China Silk City is an open air mall located in central Hangzhou City between Feng Qi Road on the south and Ti Yu Chang Road on the north, Xinhua Road on the east and Western Jian Kang Road on the west. It hosts hundreds of stores dealing in various silk fabrics, silk clothes, ties, scarves and all kinds of raw silk.
- 12. I have reviewed the video available at 
  [https://youtu.be/EFAhad9WPig?si=nmqiKNOox3Oi\_oNx], and I confirm that it accurately depicts the area where Hangzhou China Silk City is located.
- 13. The address "Xinhua Road 238" was a previous office location used by the company between 2010 and 2012, but it is no longer in use. It is also in Hangzhou China Silk City, a short walk away from our current address.
- 14. The business name "Hangzhou Chuanyue Silk Imp. & Exp. Co., Ltd." is an abbreviated form of "Hangzhou Chuanyue Silk Import & Export Co., Ltd." There are not two different companies.
- 15. In Chinese characters, "import and export" is written "进出口".

  There is no way to abbreviate the terms, so it would not be possible for different companies named "Hangzhou Chuanyue Silk Imp. & Exp. Co., Ltd" and "Hangzhou Chuanyue Silk Import & Export Co., Ltd" to coexist in China.

- 16. The company has a home page on Alibaba.com at <a href="https://danasilk.m.en.alibaba.com/index.html?spm=a2700.shop\_co.88.11.153f">https://danasilk.m.en.alibaba.com/index.html?spm=a2700.shop\_co.88.11.153f</a> ee2etGJwLD, which would have been accessible from the screenshots submitted by Plaintiff. From there, one could go to the "Contacts" page, <a href="https://danasilk.m.en.alibaba.com/contactinfo.html?spm=a2700.shop\_index.88.60.37e85cca2k88ez">https://danasilk.m.en.alibaba.com/contactinfo.html?spm=a2700.shop\_index.88.60.37e85cca2k88ez</a>, which lists the Company's address as "No. 252-256, China Silk City, Hangzhou, Located On The West Side Of Xinhua Road, Health Road And Other Silk Themed Blocks, Hangzhou, Zhejiang, China" Those links and that address have been available at those websites since as early as 2018. Exhibit C-2 is an accurate representation of the "Contacts" page.
- 17. Hangzhou Chuanyue is an Amazon seller. In accordance with Amazon's terms of service, Hangzhou Chuanyue has listed its physical address on Amazon since at least as early as 2015. That address is:

浙江杭州

杭州丝绸城 252-256 号新华路 217 号

杭州市

杭州

浙江

Which translates to:

Hangzhou, Zhejiang

No. 252-256, Hangzhou Silk City, No. 217, Xinhua Road

Hangzhou City

Hangzhou

Chekiang

I can confirm that that is the address that has been listed on Amazon since 2015. Exhibit C-3 is an accurate representation of the Amazon page showing the address.

- 18. Public records of Hangzhou Chuanyue's registered address can be accessed through the following platforms: a. The official National Enterprise Credit Information Publicity System:

  <a href="https://www.gsxt.gov.cn/index.html">https://www.gsxt.gov.cn/index.html</a> b. Commercial database websites such as Qichacha (<a href="https://www.qcc.com/">https://www.qcc.com/</a>). However, I do not know if those sites are accessible outside of China.
- 19. I have attached as **Exhibit C-4** a copy of a public record available, the Company's business license, which is also available on the Company's website. It was first issued in 2009. When translated, it shows
  - That I am the legal representative;
  - That the company was established in July 2009;
  - That the address is No. 252-256, Hangzhou China Silk Town, within the Health Road Silk Characteristic Street, West Side of Xinhua Road, Gongshu District, Hangzhou City, Zhejiang Province.

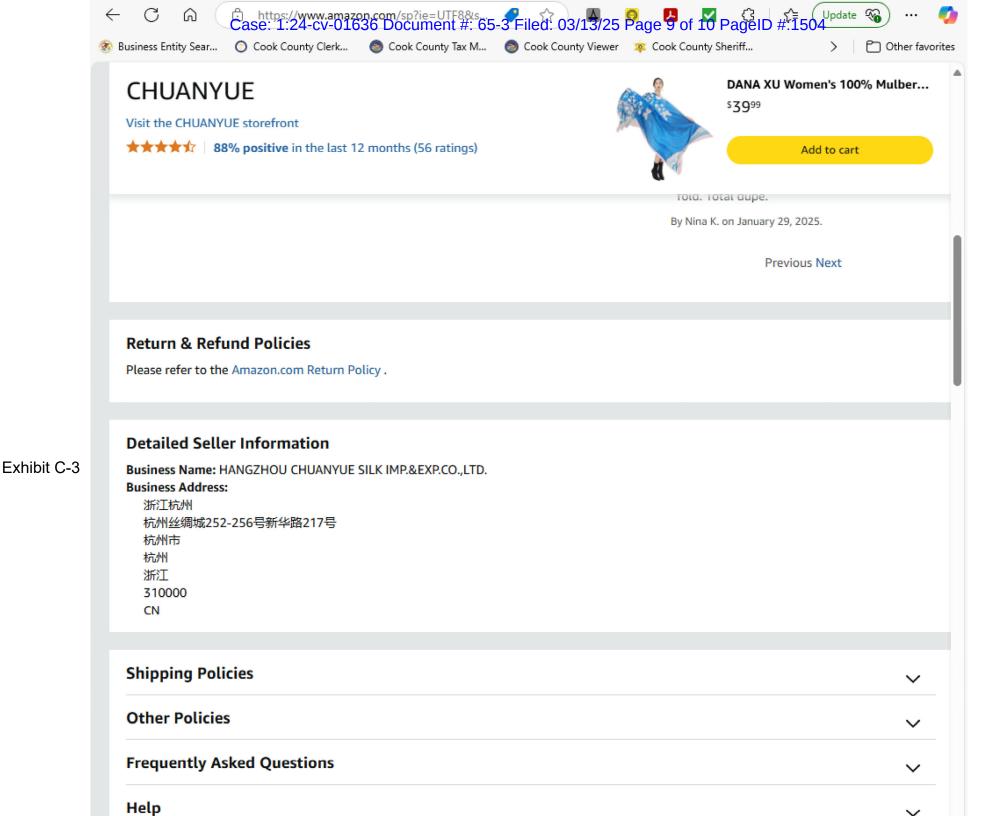
I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on this 13th day of March, 2025, in Hangzhou, China.

Shenghong Xu (a/k/a Dana Xu) Legal Representative & Manager Hangzhou

Chuanyue Silk Import & Export Co., Ltd.





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有限责任公司(自然人投资或控股)

杭州川越丝绸进出口有限公司

法

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代表人

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出口,食品经营(销售预包装食品)(依法须经批准的项目,经相关部 许可项目:保健食品销售;婴幼儿配方乳粉销售;技术进出口,货物进

目:家居用品销售,建筑材料销售,轻质建筑材料销售,模具销售,电 子产品销售,电子元器件批发,电力电子元器件销售,电子真空器件销

口批准后方可开展经营活动,具体经营项目以审批结果为准)。一般项

国家企业信用信息公示系统网址:http://www.gsxt.gov.cn

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2009年07月28日

严 浙江省杭州市拱墅区新华路西侧、 等丝绸特色街区内杭州中国丝绸城

资 记机关

2024

医疗器械销售。第二类医疗器械销售(除依法须经批准的项目外、凭管 医用)销售,医护人员防护用品批发,医护人员防护用品零售,第一类 告(象牙及其制品除外), 医用口罩零售; 医用口罩批发; 日用口罩(非 艺美术品及收藏品批发(象牙及其制品除外),工艺美术品及收藏品零 金产品零售。食用农产品批发、食用农产品零售、初级农产品收购;工 汉, 日用家电零售, 日用百货销售, 日用杂品销售, 五金产品批发, 五 专种劳动防护用品销售,鞋帽批发,鞋帽零售,日用品零售,日用品批 告, 服装服饰批发; 服装服饰零售; 服装辅料销售; 劳动保护用品销售; **七学产品销售(不含危险化学品);针纺织品销售;针纺织品及原料销 销售**,电子元器件零售,光电子器件销售,颜料销售,染料销售,专用 售;电子烟雾化器(非烟草制品、不含烟草成分)销售;电子专用材料



Exhibit C-4

国家市场监督管理总局监